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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bell Atlantic-Massachusetts Tariff No.)

17 Digital Subscriber Line Compliance Filing) D.T.E. 98-57, Phase III
and Line Sharing Filing)

RHYTHMS LINKS INC.'S AND COVAD COMMUNICATIONS COMPANY'S
FIRST SET OF DATA REQUESTS TO BELL ATLANTIC -MASSACHUSETTS

Rhythms Links, Inc. ("Rhythms") and Covad Communications Company ("Covad") hereby request that Bell Atlantic Massachusetts ("BAMA") provide the data, information and documents described below.

DEFINITIONS AND INSTRUCTIONS

1. "BAMA" refers to Bell Atlantic Massachusetts.
2. "CLEC" refers to any competitive local exchange carrier.
3. The word "similar" is intended to be as comprehensive as possible.
4. "Document" means any written, printed, typed or visually reproduced material of any kind, whether or not privileged, and includes but is not limited to the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, phonographic records, computer files, other data compilation, or any other written, recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.
5. "Due date" means BAMA's confirmation date for order completion.
6. If you file a timely objection to any portion of a request, definition, or an instruction, provide a response to the remaining portion.
7. As used in these requests, the singular shall also be treated as plural and vice-versa.
8. The responses should include the name of the person(s) providing the responses and the witness(es) who will be testifying on behalf of BAMA who will be prepared to answer questions relating to such responses.
9. If any part of a document is responsive to any request, the whole document is to be produced.
10. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed

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stamps, drafts, revisions, modifications and other versions of a final document is a separate and distinct document and it must be produced.

11. If you are unable to produce a document in response to any request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the date and manner of its disposition and identify its last known custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

12. To the extent you claim any document described herein is privileged, or to the extent that you object to the production of any of the documents, please identify each and every document to which any claim of privilege or objection to production is asserted by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of each such document, and state in writing the nature and basis for each claim of privilege or objection for each such document.

13. These data requests are continuing in nature and, thus, BAMA is under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

DATA REQUESTS

RL/CVD-1-1 Please identify the amount of and basis for any shared or common cost markup that BAMA believes should be included in its prices for line sharing related rate elements. Please describe how that factor was calculated and provide the underlying supporting calculations.

RL/CVD-1-2 Please identify whether BAMA or any affiliate of BAMA is providing DSL services over loops that are being used simultaneously by BAMA to provide voice services (i.e., line sharing). If the answer is yes, please identify when BAMA or the affiliate began to provide DSL services in this configuration. Please provide copies of any tariffs that exist for such DSL services and any cost support for such tariffs.

RL/CVD-1-3 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the tie cables/cross-connection used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

RL/CVD-1-4 Is it technically infeasible to provide a line sharing arrangement that includes a splitter mounted directly on BAMA's main distribution frame? If BAMA contends that it is technically infeasible to provide a line sharing arrangement that includes a splitter mounted directly on its main distribution frame, please provide a complete copy of all material that BAMA intends to rely on as the factual basis for that contention.

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LABOR RATES

RL/CVD-1-5 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install splitter cards in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

RL/CVD-1-6 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would place jumpers in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

RL/CVD-1-7 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install tie cables in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

RL/CVD-1-8 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would install equipment racks or frames in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

RL/CVD-1-9 Please provide BAMA's best available estimate of appropriate TELRIC study labor rate for the BAMA employee who would repair or maintain splitter equipment in a central office. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology BAMA reflects in its response was authorized.

HIGH FREQUENCY PORTION OF THE LOOP

RL/CVD-1-10 Does the cost support developed for BAMA's existing ADSL retail tariff include Residential Service Contribution Rate Element?

RL/CVD-1-11 If any Bell Atlantic affiliate currently provides DSL services, does the current rate offered by such Bell Atlantic affiliate(s) include a Residential Service Contribution Rate Element? If "yes", please explain how the revenue associated with that element is provided to such affiliate.

NRCs

RL/CVD-1-12 Please identify the percentage of BAMA central office buildings that are staffed by at least one technician during normal business hours.

RL/CVD-1-13 Does BAMA intend to impose any non-recurring charge for placing jumpers to implement any line sharing arrangement? If so, please describe the number of jumper placements that would be required in each line sharing arrangement that BAMA intends to provide.

RL/CVD-1-14 If BAMA intends to rely on any existing study of the non-recurring cost for the jumper placement used to implement any line sharing arrangement, please

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provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangement(s).

RL/CVD-1-15 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the jumper placement used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

RL/CVD-1-16 Does BAMA intend to impose any non-recurring charge for removing jumpers to implement any line sharing arrangement? If so, please describe the number of jumper removals that would be required in each line sharing arrangement that BAMA intends to provide.

RL/CVD-1-17 If BAMA intends to rely on any existing study of the non-recurring cost for the jumper removal used to implement any line sharing arrangement, please provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangement(s).

RL/CVD-1-18 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for the jumper removal used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

RL/CVD-1-19 Does BAMA intend to impose any non-recurring charge for service order processing to implement any line sharing arrangement? If so, please provide a detailed description of the assumptions incorporated into BAMA's analysis.

RL/CVD-1-20 If BAMA intends to rely on any existing study of the non-recurring cost for a service order to implement any line sharing arrangement, please provide any analysis that BAMA has done to establish that the existing study assumptions apply to BAMA's proposed line sharing arrangement(s).

RL/CVD-1-21 Please provide a complete copy of the cost study, with all associated workpapers, backup material, source or other supporting data, that BAMA intends to rely on to support any proposed non-recurring charge for service order used to implement line sharing arrangements. To the extent that BAMA believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that BAMA has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. To the extent that BAMA's study includes spreadsheet calculations or formulas, please provide a copy of that material in both electronic and paper formats.

OSS

RL/CVD-1-22 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with its pre-order, order and billing systems to provide

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line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

RL/CVD-1-23 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with updating inventory and provisioning systems to provide line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

RL/CVD-1-24 Please describe the types of incremental OSS costs that BAMA anticipates it might incur associated with testing and maintenance to provide line sharing to competitors. For each type of cost identified, if BAMA believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

RL/CVD-1-25 Please provide a complete copy of any existing correspondence between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and vendors related to incremental OSS changes that BAMA anticipates it might incur for line sharing associated with its pre-order, order and billing systems.

RL/CVD-1-26 Please provide a complete copy of any existing correspondence between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and its vendors related to incremental OSS changes that BAMA anticipates it might incur for line sharing associated with updating inventory and provisioning systems.

RL/CVD-1-27 Please provide a complete copy of any existing correspondence between one or more of BAMA, its parent, Bell Atlantic, or any affiliate and its vendors related to incremental OSS changes that BAMA anticipates it might incur for line sharing associated with testing and maintenance.

DSL Qual i f i c a t i o n

RL/CVD-1-28 Please provide a complete copy of any analysis performed by BAMA or on BAMA's behalf within the last 2 years that analyses BAMA's ability to perform loop qualification for DSL services in a fully or partially mechanized manner.

RL/CVD-1-29 Please provide a detailed description of the most recently planned process that BAMA intends or intended to determine if specific customers/customer locations qualify for its retail ADSL service. Please provide a complete copy of whatever documentation BAMA has developed for internal use that describes the current and planned future state of that process.

RL/CVD-1-30 Please provide a detailed description of the process that any BAMA affiliate plans to use to determine if specific customers/customer locations qualify for retail ADSL service. Please provide a complete copy of whatever documentation BAMA's affiliate has developed for internal use that describes the current and planned future state of that process.

RL/CVD-1-31 Please identify each activity that BAMA's believes it must perform to "qualify" an unbundled loop for DSL service that BAMA believes a competitive carrier could not perform on its own behalf if it had access to the same loop plant records that BAMA utilizes. Please explain BAMA's basis for believing that a competitive carrier could not perform each step so identified on its own behalf.

RL/CVD-1-32 For each item that BAMA's Engineering personnel currently research to determine if an unbundled loop is DSL qualified on a competitive carrier's behalf (e.g., splice points, bridge taps, load coils, cable gauge, etc.) please indicate

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the name of any BAMA electronic database that is designed to hold that data (e.g., "BAMA reviews cable gauge information. LFACS is designed to include cable gauge information.") Please specify if any data that BAMA believes is required to qualify as an unbundled loop for DSL services is not designed to be included in any current BAMA database/system (i.e., if the data is only found on paper records 100 percent of the time). If data resides both on mechanized systems and via paper records, please identify specifically what information resides on each and the extent to which the data, or portions thereof, is included in both. Please provide separate responses for each BAMA district if the responses would vary by district.

RL/CVD-1-33 Assume that BAMA is about to plan and construct all new outside plant facilities to serve a new business park and/or residential complex (creating new plant feeder and distribution routes from the ground up). In that circumstance please identify which database(s) BAMA would enter each of the following types of data into or indicate that the data would not be maintained in any electronic database or system.

The location of splice points.

- Cable gauges
- Cable lengths
- FDI locations and types
- Electronics locations and types
- Bridge tap location and design
- Repeater location and type
- Availability of spare pair
- Identification of cables, binder groups, pairs
- Presence and type of DLC
- Location serving area interfaces

Conditioning

RL/CVD-1-34 Please provide a complete copy of the engineering methods and procedures that BAMA would rely on to engineer and install new outside plant loop facilities.

RL/CVD-1-35 Please describe each type of line conditioning (e.g., removing load coils or bridge tap, adding or removing repeaters, rearranging outside plant facilities) that BAMA will undertake (in any circumstance) in order to satisfy a request for its retail ISDN service. If BAMA claims that it will only condition lines in order to provide its own retail ISDN service in limited cases, please provide a complete description of each such limitation.

RL/CVD-1-36 Please provide a copy of BAMA's methods and procedures for assessing conditioning charges on a BAMA end user of retail ISDN service. Please also provide any charges which apply and the source of the charges (intrastate tariff section, for example).

RL/CVD-1-37 For each type of line conditioning (e.g., rearranging outside plant facilities) that BAMA might choose to perform in order to satisfy a request for its retail ADSL service or to provide a qualified line to a BAMA affiliate, please describe specifically how BAMA plans to recover any cost associated with that activity. Please also provide a citation to any language in BAMA's retail tariff(s) that supports its proposed method of cost recovery.

RL/CVD-1-38 Is it BAMA's belief that both recurring and non-recurring costs should

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be calculated assuming the same network design? If "no," please explain BAMA's position on this issue.

RL/CVD-1-39 Has BAMA done any analysis to establish that the combined cost study results for recurring and non-recurring costs for all loop types it provides represents a least-cost, most efficient plant design? If so, please provide a complete copy of that analysis.

RL/CVD-1-40 Has BAMA done any analysis of the feasibility of "conditioning" multiple spare pairs to provide xDSL-type services to communities/customers who are currently served by long copper loops? If so, please provide such analysis and identify the use to which such analysis was put, what conclusions were reached and where such analysis was used to support either in whole or in part the cost study relied upon by BAMA.

RL/CVD-1-41 If not provided in response to a previous request, please supply a copy of BAMA's engineering methods and procedures relative to conditioning work required to provide retail ISDN service.

RL/CVD-1-42 Please describe each type of outside plant work activity that BAMA has performed in order to supply retail ISDN-BRI (e.g., need to swap out bad pair, service grooming, need to move ISDN capable pair to provide service, etc.)

RL/CVD-1-43 Please provide a detailed description of how costs for each of the types of activity identified in response to the previous request are incorporated in BAMA's most recent loop cost study.

RL/CVD-1-44 Is it BAMA's belief that it is not practical to "condition" multiple spare pairs either in advance or at one time to provide xDSL-type services to communities/customers who are currently served by long copper loops? If BAMA contends that such practices are not practical, please provide a complete description of BAMA's basis for that belief.

RL/CVD-1-45 When BAMA builds new outside plant loop facilities today do BAMA's engineering guidelines recommend designing plant that will support only voice grade service or does BAMA design its facilities to support digital services as well? Please provide a copy of the BAMA engineering guidelines that support BAMA's answer to this request.

RL/CVD-1-46 Does BAMA agree that general industry guidelines suggest limits to total bridge tap for loop plant that will provide digital services? In BAMA's opinion, what is the industry guideline for bridge tap for the mix of products BAMA plans to deploy in the future?

RL/CVD-1-47 Please provide a complete description of how BAMA's recurring retail exchange service cost study considers BAMA's forward-looking deployment of bridge tap. I.e., specifically what costs associated with bridge tap are included in BAMA's study, how were those costs derived and specifically where in the study do they appear? Please also provide the relevant cost of service study pages and workpapers related to such description.

RL/CVD-1-48 Has BAMA at any time employed the Carrier Serving Area ("CSA")

design guidelines in designing its outside plant? If so, please identify the timeframe during which BAMA employed CSA. Please also describe the scope of BAMA's use of CSA guidelines (e.g., was it used for all plant deployment or only in specific situations?)

RL/CVD-1-49 Does BAMA agree that one stated objective of CSA is to minimize bridge tap?

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Retail Cost Analysis

RL/CVD-1-50 Please provide a complete copy of each cost study Bell Atlantic has developed (for submission to a regulatory agency or for internal business case analysis) to determine its cost to provide retail ADSL service. If such cost study is from another jurisdiction, please identify any differences in methodology or output and indicate reasons for such variance between the current BAMA cost study and the cost study used in the alternate jurisdiction.

RL/CVD-1-51 Does the retail ADSL cost study submitted with Bell Atlantic's FCC tariff for that service include any cost for electronics or fiber facilities associated with feeder facilities? If BAMA's answer is anything other than an unqualified "no," please provide the following:

- a) A detailed description of what costs were included for feeder fiber and of how those costs were calculated.
- b) A detailed description of what FDI or RT electronics costs were included and of how those costs were calculated.
- c) A detailed description of what central office line termination electronics costs were included and of how those costs were calculated.
- d) A detailed description of what DLC electronics costs were included and of how those costs were calculated.

RL/CVD-1-52 Please identify the specific page(s) and line(s) that reflect investment and expense related to for each of the following items in Bell Atlantic's cost study in support of its FCC ADSL service filing:

- a) Splitters
- b) Splitter racking
- c) Space for splitter racking
- d) Tie cables to or from splitters
- e) Tie cables to or from a DSLAM
- f) Jumper placement
- g) Jumper removal
- h) DSL-specific OSS investment
- i) Loop qualification for DSL
- j) Line conditioning
- k) The High Frequency Portion of the Loop
- l) Loop Installation
- m) Testing
- n) Service order processing
- o) Splitter installation engineering

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p) Splitter installation ordering requirements

RL/CVD-1-53 Please provide a detailed description of the outside plant loop design that was assumed in the retail ADSL cost study submitted with Bell Atlantic's FCC tariff filing including an identification of the percentage of fiber feeder that was assumed, if any, and the specific electronics that were assumed to connect copper distribution to any fiber feeder facilities. Please specify also if any DLC was assumed to be integrated or universal.

RL/CVD-1-54 Does Bell Atlantic's retail ADSL cost study submitted with Bell Atlantic's FCC tariff filing include a cost estimate for the unbundled access necessary to provide the identical configuration(s) that BAMA proposes to offer competitive carriers for line sharing? If "no," please explain why not. If "yes," please identify which cost or combination of costs study is equivalent to the configuration(s) that Bell Atlantic assumed in its retail ADSL cost study.

RL/CVD-1-55 Please provide a copy of the most recent documentation detailing any planned changes to BAMA's telecommunication plant that relate to the demand for retail Digital Subscriber Line ("DSL"). Provide all related documentation including but not limited to BAMA's planned methodology to provide DSL services to customers with relatively long loops or with loops that are provided over fiber feeder and DLC systems, relative to copper loops that require "conditioning," etc. If a BAMA-specific planning document does not exist, please provide whatever planning document would cover BAMA's service area (even if that documentation is not final or "approved").

DLC Issues

RL/CVD-1-56 Please identify the specific manufacture(s) and model(s) of DLC equipment that BAMA currently plans to deploy in future additions/upgrades/changes to its network. Please also supply the methods and procedures or other documentation that BAMA personnel follow when selecting specific equipment for a project involving the deployment of DLC.

RL/CVD-1-57 For each type of DLC equipment mentioned in response to the previous request, please indicate if BAMA believes that that equipment is currently capable (with appropriate electronics) of providing any form of DSL service. If "yes," please describe each type of DSL service that that equipment can currently deliver.

RL/CVD-1-58 For each type of DLC equipment mentioned in response to the previous request, please indicate if BAMA believes that that equipment is currently being modified (or is in testing) to provide additional forms of DSL service. If "yes," please describe each type of DSL service that is under development.

RL/CVD-1-59 If BAMA, Bell Atlantic or any affiliate has obtained quotations from its vendors relative to prices for upgrading its existing DLC systems to support DSL services, please provide a complete copy of those quotations and of any related description of the upgrade process and capacity. Please provide any related contracts between any of BAMA, Bell Atlantic or any affiliate and vendors, including all discount provisions.

RL/CVD-1-60 Has BAMA developed a cost study that provides a specific cost result for the transport of DSL service related data over BAMA's fiber feeder facilities? If "yes," please identify the specific location of that result and of any supporting discussion. If "no," please explain why BAMA has not provided a cost study to support that capability.

RL/CVD-1-61 Is it BAMA's position that it is technically infeasible to transport DSL

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service related data over digital loop carrier ("DLC") and fiber feeder facilities to end users? If "yes," please provide a detailed description of the basis for BAMA's position.

RL/CVD-1-62 Does BAMA believe that all retail DSL demand which is met by its own retail product (or the service of an affiliated provider), will be provisioned over all-copper loops (i.e., loops that do not include fiber feeder facilities) through at least 2002? Please provide a complete description of the basis for BAMA's response.

RL/CVD-1-63 To the best of its knowledge and belief, does BAMA expect that any affiliated company will provide DSL services to end user customers whose local loops include any fiber cable? If anything other than an unqualified "no," please provide an outline of the overall arrangement of outside plant equipment (owned both by BAMA and/or by BAMA's affiliate) that BAMA believes will most likely use to provide that service.

RL/CVD-1-64 Please provide all correspondence and other written materials (including slides) provided by Bell Atlantic or any affiliate to any state commissioners, state commission staff, Attorneys General, or consumer advocates regarding its DSL and/or line sharing deployment plans.

RL/CVD-1-65 Please provide any internal policy guidelines and/or procedures regarding DSL deployment and/or line sharing developed by Bell Atlantic and provided to BAMA, and any other such internal policy guidelines and/or procedures provided to BAMA. If such guidelines or procedures are under development or revision, please state when such new or revised guidelines or procedures are expected to be released.

RL/CVD-1-66 Please provide any scripts or internal sales procedures provided to employees or agents of BAMA or BAMA affiliates that market retail DSL services of BAMA.

RL/CVD-1-67 Please provide copies of responses to any other data requests propounded on BAMA in this proceeding (or any proceeding consolidated with this proceeding).

RL/CVD-1-68 Please state what common cost markup, if any, Bell Atlantic believes that the Commission adopted for use in Massachusetts and describe how that markup level was calculated.

RL/CVD-1-69 Please state what shared cost markup (as opposed to a common cost markup(s) referenced in the previous discovery request), if any, Bell Atlantic believes that the Commission adopted for use in Massachusetts.

RL/CVD-1-70 If Bell Atlantic believes it is appropriate to use a shared cost markup for any line sharing related rate element, please describe how Bell Atlantic developed it.

RL/CVD-1-71 Please state whether the common and/or shared cost markups, if any, that Bell Atlantic used in its studies of splitter-related rate elements apply equally to the recurring and nonrecurring rate elements studied. If Bell Atlantic believes that the common and/or shared cost markups should apply to nonrecurring line sharing-related rate element, please provide the basis for that belief.

Direct Test Access

RL/CVD-1-72 Please state which types of Bell Atlantic employees have direct access to the main distribution frame ("MDF") in Bell Atlantic's central offices.

RL/CVD-1-73 Please identify each type of non Bell Atlantic employees that have direct access to the main distribution frame ("MDF") in Bell Atlantic's central offices for any purpose.

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RL/CVD-1-74 Please state whether Bell Atlantic employees have conducted or currently conduct testing on loops at the MDF for any services. If the answer is yes, please state what kinds of services Bell Atlantic's employees tested or test at the MDF.

RL/CVD-1-75 Please state whether Bell Atlantic has used any sort of wideband testing equipment on its loops. If the answer is yes, please list all types of such wideband testing equipment.

RL/CVD-1-76 Please state whether Bell Atlantic has conducted wideband testing in conjunction with its retail Infospeed DSL service offering. If the answer is yes, please state the percentage of Infospeed DSL loops for which Bell Atlantic has conducted wideband testing.

RL/CVD-1-77 Please state the date on which Bell Atlantic plans to have Hekimian wideband testing equipment fully deployed at all central offices in which CLECs have indicated that they will collocate splitters.

RL/CVD-1-78 Please state what information derived from use of the Hekimian wideband testing equipment Bell Atlantic will provide to requesting CLECs. Please also state how Bell Atlantic will provide that information.

RL/CVD-1-79 Please state whether Bell Atlantic will provide requesting CLECs with electronic access to the Hekimian wideband testing equipment that Bell Atlantic plans to deploy.

RL/CVD-1-80 Please provide Bell Atlantic's Network Planning Document (NP-DP-99-155).

RL/CVD-1-81 Please state the dates that Bell Atlantic first offered Infospeed DSL service in Maryland, Massachusetts, New York, and Pennsylvania.

RL/CVD-1-82 Please provide the average number of troubles per 100 Infospeed DSL service arrangements annually.

RL/CVD-1-83 Please provide all studies that Bell Atlantic has conducted showing that per-line costs of deploying Hekimian wideband testing equipment are less than the average costs per line of dispatching technicians to clear troubles on loops used for xDSL services.

Provisioning Interval for Line Sharing

RL/CVD-1-84 For both options A and C, please state and describe each step in the process of provisioning an individual line sharing arrangement (assuming that the CLEC splitter is installed and hard-wired to the CLEC's digital subscriber line access multiplexer). Please also state the amount of labor time attributable to each step in these processes.

RL/CVD-1-85 Please state the average interval in which Bell Atlantic provisions Infospeed DSL.

RL/CVD-1-86 Please state whether Bell Atlantic conducts a dispatch of any kind in provisioning Infospeed DSL.

RL/CVD-1-87 Please state the average interval in which Bell Atlantic provisions hot-cut loops. Please also state the percentage of such loops that require a dispatch as part of the provisioning process.

RL/CVD-1-88 Please state the average interval in which Bell Atlantic provisions ADSL loops. Please also state the percentage of such loops that require a dispatch as

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part of the provisioning process.

RL/CVD-1-89 Please provide any documents that address or analyze the expected interval for provisioning line sharing arrangements.

RL/CVD-1-90 Please provide any documents that address or analyze the interval for provisioning Infospeed DSL services.

Splitter Collocation Interval

RL/CVD-1-91 For both options A and C, please state and describe each step in the process of collocating a splitter (assuming that the splitter is hard-wired to the CLEC's digital subscriber line access multiplexer). Please also state the amount of labor time attributable to each step in these processes.

RL/CVD-1-92 Please state and describe each step in the process of collocating a splitter on behalf of Bell Atlantic Network Data, Inc. Please also state the amount of labor time expected to be attributable to each step in the process.

RL/CVD-1-93 Please provide any documents that address or analyze the expected interval for collocating splitters.

RL/CVD-1-94 Please provide any documents that address or analyze the expected interval for collocating splitters on behalf of Bell Atlantic Network Data, Inc.

Remote Terminal Access

RL/CVD-1-95 Please state whether Bell Atlantic is unable to provide collocation in any remote terminal in this state. Please state the reasons Bell Atlantic is unable to provide collocation in any such remote terminals.

Recurring Loop Rate for Line Sharing

RL/CVD-1-96 Please provide any cost support that Bell Atlantic submitted to the FCC for Infospeed DSL.

Pair Swaps

RL/CVD-1-97 Please state whether Bell Atlantic will provide Line-Station Transfers for line shared loops.

RL/CVD-1-98 Please specifically identify each cost for collocation at Bell Atlantic's remote terminals that Bell Atlantic included or believes that it should have included in its cost analysis for its retail Infospeed service.

RL/CVD-1-99 Has Bell Atlantic Corporation developed methods and procedures for working with any affiliated company to provide any DSL service in a line sharing

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arrangement? If so, please provide a complete copy of that documentation. Please note that this request specifically includes information that is in draft format or otherwise under development.

RL/CVD-1-100 Has Bell Atlantic Corporation developed any analysis of the cost required to modify its OSS to work with any affiliated company to provide any DSL service in a line sharing arrangement? If so, please provide a complete copy of that documentation. Please note that this request specifically includes information that is in draft format or otherwise under development.

RL/CVD-1-101 Has Bell Atlantic Corporation any estimate of the cost that was incurred to modify its OSS to provide its retail DSL service in a line sharing arrangement? If so, please provide a complete copy of that documentation. Please note that this request specifically includes information that is in draft format or otherwise under development.

RL/CVD-1-102 Please provide a complete copy of all documentation that Bell Atlantic intends to rely on to support the validity of its reported costs for each rate element that Bell Atlantic intends to charge to implement a line sharing arrangement for competitive carriers.

RL/CVD-1-103 If Bell Atlantic intends to rely on any existing study of the non-recurring cost for the tie cables/cross-connection used to implement any line sharing arrangement, please provide any analysis that Bell Atlantic has done to establish that the existing study assumptions (e.g., cable lengths, frame types, etc.) apply to Bell Atlantic's proposed line sharing arrangement(s).

RL/CVD-1-104 Please supply Bell Atlantic's best estimate of the total hours of labor required to install 24 quad splitter cards in an existing rack mounted splitter shelf. Please also supply a description of the basis for and any documentation supporting Bell Atlantic's reply.

RL/CVD-1-105 Please supply Bell Atlantic's best estimate of the total hours of labor required to install the type of relay rack used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting Bell Atlantic's reply.

RL/CVD-1-106 Please supply Bell Atlantic's best estimate of the total hours of labor required to install the type of frame used to hold splitter shelves. Please also supply a description of the basis for and any documentation supporting Bell Atlantic's reply.

RL/CVD-1-107 Please provide a complete copy of all internal documentation related to plans to mechanize any portion of Bell Atlantic's systems and processes to qualify loops for ADSL service(s).

RL/CVD-1-108 Does Bell Atlantic agree that, with the CSA design concept, the maximum allowable bridged-tap is 2.5 kft, with no single bridged-tap longer than 2.0 kft? If "no," please provide the basis for Bell Atlantic's belief.

RL/CVD-1-109 Does Bell Atlantic agree that, with the CSA design concept, all loops must be unloaded and should not consist of more than two gauges of cable? If "no," please provide the basis for Bell Atlantic's belief.

RL/CVD-1-110 If Bell Atlantic intends to rely on any existing study as the basis for the cost of engineering a line sharing arrangement, please provide any analysis that Bell Atlantic has done to establish that the existing study assumptions (e.g., cable lengths, frame types, etc.) apply to Bell Atlantic's proposed line sharing arrangement(s).

RL/CVD-1-111 Will the decision to establish a separate subsidiary to provide DSL

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services in any way affect BA's \$800 million commitment to Alcatel to purchase ADSL electronics for integrating Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC) solutions (see Alcatel and Bell Atlantic press release of April 8, 1999, Available at http://www.alcatel.com/press/current/1999/04_08.htm)? If so, please describe specifically how that commitment would be or is affected.

RL/CVD-1-112 Please provide a complete copy of all documentation generated by Bell Atlantic (or BA) that memorialized BA's \$800 million commitment to Alcatel to purchase ADSL electronics for integrating Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC) solutions or the terms thereof.

RL/CVD-1-113 Please provide a complete copy of any network engineering documents that describe how Bell Atlantic (or BA) specifically plans integrate Alcatel's 1000 ADSL ATM Subscriber Access Multiplexer (ASAM) TM and Litespan™ Next Generation Digital Loop Carrier (NGDLC) solutions in its outside plant network.

RL/CVD-1-114 Is the ADSL related equipment that BA has committed to purchase from Alcatel designed to support the provision of DSL-capable unbundled loops to multiple carriers? If "yes," please provide documentation supporting BA's response. If "no," please explain how Bell Atlantic intends to supply unbundled DSL-capable loops over its fiber/DLC facilities both to affiliated and unaffiliated DSL retail service providers.

RL/CVD-1-115 In Pennsylvania Docket Numbers R-00994697 and R-00994697C0001 in response to Set I, Interrogatory No. 26 of Rhythms Links Inc. dated November 24, 1999, BA asserted that "... Bell Atlantic (region-wide) will deploy by the end of year 2002, approximately 9000 new optical remotes capable of delivering its retail ADSL service offering to end users." If BA anticipates that those plans would be cancelled or modified if Bell Atlantic ceases to provide retail ADSL service, please provide a detailed description of each anticipated modification.

RL/CVD-1-116 Does Bell Atlantic anticipate that any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be available to CLECs on an unbundled basis?

RL/CVD-1-117 Does Bell Atlantic anticipate that any cost of "new optical remotes capable of delivering its retail ADSL service offering to end users" will be recorded in the Bell Atlantic's books?

RL/CVD-1-118 Does Bell Atlantic anticipate that installation expense associated with any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be recorded in Bell Atlantic's books?

RL/CVD-1-119 Does Bell Atlantic anticipate that any "new optical remotes capable of delivering its retail ADSL service offering to end users" will be capable of providing DSL service over multiple physical or virtual channels in a manner that allows data to be directed to different DSL service providers? If anything other than an unqualified "no," please provide a detailed discussion of that capability.

Please provide your responses to Alan Mandl, Mandl & Mandl LLP, 10 Post Office Square Suite 630, Boston, Massachusetts 02109; Elise Kiely and Helene Courard, Blumenfeld & Cohen, 1625 Massachusetts Avenue, Suite 300, Washington, D.C. 20036; and Antony Petriila, Covad Communications Company, Hamilton Square, 600 14th Street NW, Suite 750, Washington, DC 20005, by June 9, 2000.

Respectfully submitted,

RHYTHMS LINKS INC. AND COVAD COMMUNICATIONS COMPANY

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